

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE: November 1, 1985

SUBJECT: Preliminary Assessment review of Cosden Oil and Chemical Company

FROM: Claire Tiedeman

TO: Jeff Rosenbloom

There is insufficient evidence in the PA file to indicate that no hazardous waste problem exists at the Cosden Oil and Chemical Company site. My main concern is the lack of documentation regarding the dismantling and removal of 3 underground storage tanks at the facility in 1983. A report on this incident would be helpful to determine whether or not any problems occurred during the removal operation.

Additionally, there were spills at the site in 1978 and in 1982. Although both involved explosive gas leaks, on-site contamination could have occurred, and there is not enough documentation in the file to show that possible contamination was mitigated. For the 1978 spill, there are only newspaper clippings, and for the 1982 leak, a fire department report and a phone memo to an Orange County Health Department official who stated that "the [fire department] report seems to indicate that sampling was not necessary after the incident was controlled."

Lastly, a phone memo to another Orange County Health official addresses the removal of "lab pack chemicals identified during the 3/23/84 inspection." The inspection report is included in the file, but the manifest confirming removal is only verified in the phone memo. A copy of this document should also be in the
OK PA file.

Considering the past incidents at Cosden Oil and Chemical Co., more evidence should be presented to show that this inactive site has been effectively cleaned up. At a minimum (especially if information about the past activities cannot be found), the documentation referred to in 17a. of the Preliminary Assessment information sheet should be included in the file ("old operator has documented clean-up with Orange County Health").